



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 30, 2016

BY ECF

Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

**Re: United States v. Kaleil Isaza Tuzman et al.,
S7 15 Cr. 536 (PGG)**

Dear Judge Gardephe:

The Government respectfully submits this letter to update the Court on the status of the privilege review being conducted by counsel for Stephen Maiden ("Maiden"). As the Court knows, Maiden's counsel has been reviewing the documents that were only on the SEC Images and that contain one or more of the search terms from the Forensic Imaging and Analysis Agreement. That review is nearly complete. Maiden's counsel has informed the Government that it expects to produce a detailed privilege log by January 6, 2017. Once that privilege log is complete, Maiden's counsel will meet and confer with Tuzman's counsel to determine whether further litigation on this issue will be necessary.

Accordingly, the parties propose to update the Court in two weeks, on January 13, 2017.

Respectfully submitted,

PREET BHARARA
United States Attorney

By: /s/_____
Damian Williams/Andrea M. Griswold
Assistant United States Attorneys
(212) 637-2298/1205